



Order Filed on October 16, 2017  
by Clerk U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Joanne Jacuk

Case No.: 16-17561-JNP

Chapter: 13

Hearing Date: \_\_\_\_\_

Judge: Poslusny

**CONSENT ORDER AND CARVE-OUT AGREEMENT REGARDING STATE OF NEW  
JERSEY SECURED CLAIM**

The relief set forth on the following pages, numbered two (2) through three (3) is  
**ORDERED.**

**DATED: October 16, 2017**

A handwritten signature in dark ink, appearing to read "J. Poslusny, Jr.", written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Page: 2 of 3  
Name of Debtors: Joanne Jacuk  
Case No.: 16-17561-JNP  
Caption of Order: Consent Order and Carve-Out Agreement Regarding State of New Jersey Secured Claim

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This Consent Order and Carve-Out Agreement is entered into between Joanne Jacuk (the ‘Debtor’) and the State of New Jersey, Division of Taxation (the ‘State of New Jersey’).

WHEREAS,

1. The State of New Jersey has filed proof of claim #4-1, setting forth a secured claim (or in the alternative, a priority claim) in the amount of \$121,673.38 (the ‘Secured Claim’).
2. Whereas the Secured Claim arises out of debts owed by Highgate Steel, Inc., of which the Debtor was a responsible person, and the State of New Jersey has filed a Certificate of Debt under DJ-060542-2007 against the Debtor.
3. Whereas the Debtor and the State of New Jersey wish to compromise the Secured Claim in order to facilitate payment to the State of New Jersey from the sale of the Debtor’s residence located at 7 Windgate Drive, Cherry Hill, New Jersey.

THEREFORE, the Debtor and the State of New Jersey have agreed as follows:

4. The State of New Jersey shall accept \$45,000 from the sale of 7 Windgate Drive, Cherry Hill, New Jersey in full and complete satisfaction of the Secured Claim.
5. Within thirty (30) days of receipt of the \$45,000 payment, the State of New Jersey shall file a warrant to satisfy judgment for DJ-060542-2007.
6. The State of New Jersey grants a carve-out of the remaining balance of the Secured Claim (i.e. \$76,673.38) in favor of the Debtor/Chapter 13 Estate.

Page: 3 of 3  
Name of Debtors: Joanne Jacuk  
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Secured Claim

I hereby agree to the form and content of this Consent Order

McDowell Posternock  
Apell & Detrick, PC

BY: /s/ Daniel Reinganum Date: 10/6/2017  
Daniel Reinganum, Esq.  
Attorney for Debtor

State of New Jersey  
Division of Taxation

BY: /s/ Erica Hamlin Date: 10/5/2017  
Erica Hamlin  
Investigator